

FILED

AO 91 (Rev. 11/11) Criminal Complaint

MAY 16 2024**UNITED STATES DISTRICT COURT**for the
Western District of TexasCLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  **DEPUTY**

United States of America

v.

Michael Lane HAYES

Case No. DR-24-M-1422(1)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

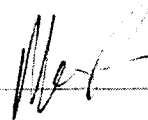
On or about the date(s) of May 16, 2024 in the county of Maverick in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm.

This criminal complaint is based on these facts:

HAYES is a convicted felon and was in possession of two firearms that were manufactured outside of the state of Texas.

☒ Continued on the attached sheet.*Complainant's signature*

Manuel Ruiz TFO ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/16/2024*Judge's signature*City and state: Del Rio, Texas

Matthew Watters, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

1, ATF TFO Manuel Ruiz, being duly sworn do hereby depose and state:

1. Your Affiant is currently employed as a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since March 2024 and is currently assigned to the Del Rio Satellite Office. Prior to March 2024, your Affiant was employed as a Border Patrol Agent working for an Anti-Smuggling Unit in Del Rio, Texas for six years. Your Affiant has a combined total of approximately six years of law enforcement experience and training with experience in investigations concerning violations of Title 18.
2. On May 16, 2024, Texas Department of Public Safety executed a state arrest warrant on Michael Lane HAYES to be followed by a state residential search warrant at his house, located at 21437 FM 1021 El Indio, Texas 78860.
3. Prior to the execution of the search warrant, ATF Special Agents received consent from HAYES to search the property. During this conversation HAYES advised there was a firearm inside the residence, of which he was sole occupant.
4. A consented search of the residence revealed a Smith and Wesson SD40 VE, 9mm pistol, with serial number FZS9228 next to HAYES' bed, and a Hatfield, SGL, 410 shotgun with serial number 410S17-005228 in an adjacent room.
5. A criminal history inquire of HAYES revealed that he was convicted of felony Forgery on 05/23/2006 in Sabine, LA, for which he was sentenced to eight years in prison, making him prohibited from possessing firearms.
6. During a post Miranda interview, HAYES admitted to possessing both firearms, claiming that he and his ex-wife purchased the firearms in approximately 2017, and he now uses them for personal protection.
7. An Interstate Nexus examination was completed which determined both firearms were manufactured outside the state of Texas.

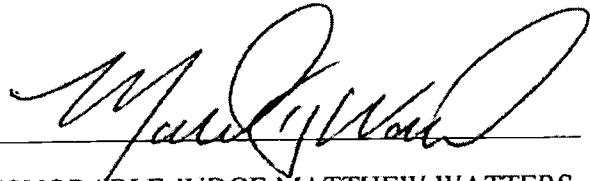
8. Based on the above facts, your affiant believes there is probable cause that **Michael Lane HAYES**, committed the offense of felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).



TFO ATF Manuel Ruiz

Bureau of Alcohol, Tobacco, Firearms, and
Explosives

SUBSCRIBED AND SWORN TO ME THIS 16TH DAY OF MAY 2024.



HONORABLE JUDGE MATTHEW WATTERS

UNITED STATES MAGISTRATE JUDGE